# EXHIBIT B, PART 1

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

THE ESTATE OF ANTHONY K. BROWN By and through VARA BROWN 6201 Neff Street Detroit, MI 48224

and

VARA BROWN 6201 Neff Street Detroit, MI 48224

and

JOHN BROWN 6201 Neff Street Detroit, MI 48224

and

SULBA BROWN 6201 Neff Street Detroit, MI 48224

and

ROWEL BROWN 6201 Neff Street Detroit, MI 48224

and

MARVINE MCBRIDE 15065 Lincoln Avenue East Point, MI 48021

and

LAJUANA SMITH 20284 Forrer Street Detroit, MI 48235

and

AMENDED COMPLAINT

Civil Action No. 08-cv-00531-RCL

JOSEPH A. BARILE 305 Lucas Park Drive Greensboro, NC 27455

and

ANGELA E. BARILE 6546 Date Palm Boulevard, #9 Port Richey, FL 34668

and

MICHAEL BARILE 223 Carterett Avenue Seaside Heights, NJ 08751

and

ANDREA CIARLA 7121-B Congress Street New Port Richey, FL 34653

and

ANN MARIE MOORE 7127 Congress Street, #201 New Port Richey, FL 34653

and

ANGELA YOAK 5405 Alton Parkway, #5A764 Irvine, CA 92604

and

JOHN BECKER 658 Glenmore Drive Evansville, IN 47715

and

RODNEY E. BURNS 34155 Monroe Road, #466 Stoutsville, MO 65283 and

DAVID BURNS 2566 Highway East Silex, MO 63377

and

EUGENE BURNS 23591 Monroe Road, #483 Stoutsville, MO 65283

and

JEANNIE SCAGGS 15098 Iva Court Wright City, MO 63390

and

DANIEL CUDDEBACK, JR. 414 Winchell Mountain Road Millerton, NY 12546

and

BARBARA CUDDEBACK 46 Wakeman Road Millerton, NY 12546

and

DANIEL CUDDEBACK, SR. 46 Wakeman Road Millerton, NY 12546

and

JOHN R. CUDDEBACK 414 Winchell Mountain Road Millerton, NY 12546

and

**ROBERT DEAN** 

2817 W. Sixth Street Little Rock, AR 72205

and

MICHAEL EPISCOPO 107 Fleetwood Lane Minoa, NY 13116

and

RANDY GADDO 191 McIntosh Trail Peachtree City, GA 30269

and

LOUISE GADDO BLATTLER 2984 Jamestown Court, North Mishawaka, IN 46545

and

PETER GADDO P.O. Box 30 Pelham, NC 27311

and

TIMOTHY GADDO 5530 Sycamore Lane, North Plymouth, MN 55442

and

THE ESTATE OF WILLIAM R. GAINES, JR. By and through MICHAEL A. GAINES 14215 Puffin Court Clearwater, FL 33762

and

MICHAEL A. GAINES 14215 Puffin Court Clearwater, FL 33762 and

WILLIAM R. GAINES, SR. 14215 Puffin Court Clearwater, FL 33762

and

EVELYN SUE SPEARS ELLIOTT 3149 Trinity Road Lexington, KY 40503

and

CAROLYN SPEARS 1100 Parklawn Drive Lexington, KY 40517

and

MARK SPEARS 461 Stone Creek Drive Lexington, KY 40503

and

JAMES S. SPEARS 1100 Parklawn Drive Lexington, KY 40517

and

CAROL WEAVER 1108 Weaver Farms Lane Spring Hill, TN 37174

and

THE ESTATE OF VIRGEL HAMILTON By and through GLORIA HAMILTON 8 Ashgrove Court Franklin, OH 45005

and

**GLORIA HAMILTON** 

8 Ashgrove Court Franklin, OH 45005

and

BRUCE HASTINGS 23633 Beech Lane Seaford, DE 19973

and

MAYNARD HODGES 230 Maple Avenue Rocky Mountain, VA 19973

and

LORETTA BROWN 107 Falcon Ridge Road Rocky Mountain, VA 24151

and

KATHY HODGES 230 Maple Avenue Rocky Mountain, VA 19973

and

MARY JEAN HODGES 10 Law Street Rocky Mountain, VA 24151

and

CINDY HOLMES 885 Monticello Drive Pinehurst, NC 28374

and

SHANA SAUL 1800 Wachovia Tower, Drawer 1200 Roanoke, VA 24006

and

DANIEL JOY P.O. Box 1553 Jacksonville, NC 28541

and

SEAN KIRKPATRICK 14845 99<sup>th</sup> Way, SE Yelm, WA 98597

and

DANIEL KREMER 6633 North Canal Road Lockport, NY 14094

and

THE ESTATE OF CHRISTINE KREMER By and through JOSEPH KREMER 16 Square Court Gettsville, NY 14068

and

JOSEPH T. KREMER 16 Square Court Gettsville, NY 14068

and

THE ESTATE OF THOMAS KREMER By and through JOSEPH KREMER 16 Square Court Gettsville, NY 14068

and

JACQUELINE STAHRR 106 Stutzman Road Bowmansville, NY 14026

and

THE ESTATE OF DAVID A. LEWIS

By and through BETTY LEWIS 13603 Alvin Avenue Garfield Heights, OH 44105

and

BETTY LEWIS 13603 Alvin Avenue Garfield Heights, OH 44105

and

JERRY L. LEWIS 4395 Glenmere Drive Warrensville Heights, OH 44105

and

SCOTT M. LEWIS 4544 Merrygold Avenue Warrensville Heights, OH 44128

and

PAUL MARTINEZ, SR. 19426 Highlite Drive Clinton Township, MI 48035

and

TERESA GUNTHER 477 Labelle Street Gross Point Farms, MI 48236

and

ALPHONSO MARTINEZ 30348 Cosino Street Warren, MI 48092

and

DANIEL L. MARTINEZ 13803 Fairmount Drive Detroit, MI 48205 and

MICHAEL MARTINEZ 7100 W. Samaria Road Ottawa Lake, MI 49267

and

PAUL MARTINEZ, JR. 18560 Huntington Avenue Harper Woods, MI 48225

and

TOMASITA L. MARTINEZ 18960 Hamburg Street Detroit, MI 48205

and

ESTHER MARTINEZ PARKS 18960 Hamburg Street Detroit, MI 48205

and

SUSANNE YEOMAN 8637 Sterling Street Centerline, MI 48015

and

JOHN OPATOVSKY 26 7<sup>th</sup> Street Hillburn, NY 10931

And

THE ESTATE OF JEFFREY B. OWEN By and through STEVEN OWEN 2101 Parks Avenue, Suite 801 Virginia Beach, VA 23451

and

JEAN G. OWENS

509 Malibu Drive, #315 Virginia Beach, VA 23452

and

STEVEN OWEN 2101 Parks Avenue, Suite 801 Virginia Beach, VA 23451

and

THE ESTATE OF MICHAEL L. PAGE By and through MARY BETH PAGE 4106 West 220<sup>th</sup> Street Fairview Park, OH 44126

and

ALBERT PAGE 952 State Route 511 North Lot 23 Ashland, OH 44805

and

JANET PAGE 952 State Route 511 North Lot 23 Ashland, OH 44805

and

JOYCE CLIFFORD 190 Orchard Park Road Mansfield, OH 44904

and

DAVID PENOSKY 850 Wescott Park Road Mantu, NC 27954

and

JOSEPH PENOSKY 5456-1 Hughes Street Fort Hood, TX 76544

and

CHRISTIAN R. RAUCH 18 Gurnec Avenue Haverstraw, NY 10927

and

LEONARD PAUL TICE 720 Third Avenue, #513 New Cumberland, WV 26047

and

THE ESTATE OF BURTON WHERLAND By and through SARAH WHERLAND 206 NE 90<sup>th</sup> Terrace Kansas City, MO 64155

and

GREGORY WHERLAND 101 E. 69<sup>th</sup> Way Long Beach, CA 90805

and

KIMMY WHERLAND 1515 Capalina Road, #414 San Marcos, CA 92069

and

SARAH WHERLAND 206 NE 90<sup>th</sup> Terrace Kansa City, MO 64155

and

SHARON DAVIS 1298 Old State Route 78 Batavia, OH 45103

and

CHARLES F. WEST 845 Washington Street New Richmond, OH 45157

and

CHARLES H. WEST 1211 Washington Street Parkersburg, WV 26101

and

RICK WEST 1217 Pondview Drive Manning, SC 29102

and

ALAN C. ANDERSON P.O. Box 556 Holden, WV 25625

and

MICHAEL ANDERSON 1808 ½ Marcum Terrace Huntington, WV 25705

and

THELMA ANDERSON P.O. Box 556 Holden, WV 25625

and

THE ESTATE OF STEPHEN B. BLAND By and through RUTH ANN BLAND 104 Barkwood Lane Greenwood, SC 28540

and

THE ESTATE OF FRANK BLAND By and through JAMES BLAND

3702 Briscoe Street Greenville, TX 74010

and

JAMES BLAND 3702 Briscoe Street Greenville, TX 74010

and

RUTH ANN BLAND 104 Barkwood Lane Greenwood, SC 28540

and

THE ESTATE OF LAURA V. COPELAND By and through STEVEN COPELAND 125 Prairie Creek Red Oak, TX 75154

and

THE ESTATE OF SIDNEY DECKER By and through IDA AND DUDLEY DECKER 1912 Rocky Hill Estates Road Clarkson, KY 42726

and

DUDLEY DECKER 1912 Rocky Hill Estates Road Clarkson, KY 42726

and

IDA DECKER 1912 Rocky Hill Estates Road Clarkson, KY 42726

and

JOHNNIE DECKER 1912 Rocky Hill Estates Road Clarkson, KY 42726 and

CAROLYN MUDD 1215 Conoloway Road Clarkson, KY 42726

and

RONALD DUPLANTY 837 SW Sundown Trail Burleson, TX 76028

and

THE ESTATE OF SEAN F. ESTLER By and through LOUIS C.ESTLER, JR. AND MARY ELLEN ESTLER 44 Strathmere Street Waretown, NJ 08758

and

KEITH ESTLER 133 Vermont Trail Hopanteong, NJ 07843

and

LOUIS C. ESTLER, JR. 44 Strathmere Street Waretown, NJ 08758

and

MARY ELLEN ESTLER 44 Strathmere Street Waretown, NJ 08758

and

THE ESTATE OF BENJAMIN E. FULLER By and through DAVID ALLEN 336 Grist Mill Drive Acworth, GA 30101-4772 and

ELAINE ALLEN 336 Grist Mill Drive Acworth, GA 30101-4772

and

ERNEST C. FULLER c/o DAVID ALLEN 336 Grist Mill Drive Acworth, GA 30101-4772

and

JOHN GIBSON P.O. Box 417 Fort McCoy, FL 32134

and

HOLLY GIBSON P.O. Box 417 Fort McCoy, FL 32134

and

MAURICE GIBSON 2004 South Moore Road Springfield, MO 65807

and

THE ESTATE OF MICHAEL HASTINGS By and through JOYCE HASTINGS 300 Fifth Street Seaford, DE 19973

and

JOYCE HASTINGS 300 Fifth Street Seaford, DE 19973

and

THE ESTATE OF PAUL HEIN By and through JO ANN HEIN 51209 Brandychase West Granger, IL 46530

and

CHRISTOPHER HEIN 51209 Brandychase West Granger, IL 46530

and

JO ANN HEIN 51209 Brandychase West Granger, IL 46530

and

KAREN HEIN 51209 Brandychase West Granger, IL 46530

and

VICTOR HEIN 12909 S. Escanaba Chicago, IL 60633

and

JACQUELINE M. KUNCYZ O No 734 Woodlawn Street Wheaton, IL 60187

and

THE ESTATE OF JOHN HENDRICKSON By and through DEBORAH RYAN 310 Wildwood Drive Jacksonville, NC 28546

and

JOHN HENDRICKSON, JR. 310 Wildwood Drive

Jacksonville, NC 28546

and

TYSON HENDRICKSON 310 Wildwood Drive Jacksonville, NC 28546

and

DEBORAH RYAN 310 Wildwood Drive Jacksonville, NC 28546

and

THE ESTATE OF BRUCE HOLLINGSHEAD By and through MELINDA HOLLINGSHEAD 115 Powell Avenue Fairbourne, OH 45324

and

MELINDA HOLLINGSHEAD 115 Powell Avenue Fairbourne, OH 45324

and

RENARD MANLEY 920 Girard Drive Orlando, FL 37824

and

THE ESTATE OF MICHAEL R. MASSMAN By and through LYDIA MASSMAN 2520 W. Cobblestone Road La Habra, CA 90631

and

NICOLE GOMEZ 7953 Nightingale Lane San Diego, CA 92123 and

ANGELA MASSMAN 6910 Dale Street, Apt. A Bucna Park, CA 90621

and

KRISTOPHER MASSMAN 14420 Dunnet Avenue La Mirada, CA 90638

and

LYDIA MASSMAN 2520 W. Cobblestone Road La Habra, CA 90631

and

PATRICIA LOU SMITH 1909 Military Street, #6 Port Huron, MI 48060

and

THE ESTATE OF LOUIS MELENDEZ By and through ZAIDA MELENDEZ P.O. Box 662 Ceiba, Puerto Rico 00635

and

DOUGLAS J. MELENDEZ P.O. Box 662 Ceiba, Puerto Rico 00635

and

JOHNNY MELENDEZ P.O. Box 662 Ceiba, Puerto Rico 00635

and

JOHNNY MELENDEZ, JR.

P.O. Box 662 Ceiba, Puerto Rico 00635

and

ZAIDA MELENDEZ P.O. Box 662 Ceiba, Puerto Rico 00635

and

THE ESTATE OF MICHAEL D. MERCER By and through SARAH MERCER BLACKMAN 49 Harvey Place Benson, NC 27504

and

SARAH MERCER BLACKMAN 49 Harvey Place Benson, NC 27504

and

SAMUEL PALMER 10710 Leonard Oak Road Morgantown, KY 42261

and

ROBIN NICELY 104 Iron Ore Lane Clifton Forge, VA 24422

and

THE ESTATE OF JUAN RODRIGUEZ By and through LOUISA PUNTONET 416 Campus Street Celebration, FL 34747

and

LOUISA PUNTONET 416 Campus Street Celebration, FL 34747 and

ROBERT RUCKER 379 Orchard Drive Waynesville, NC 28786

and

THE ESTATE OF BILLY SAN PEDRO By and through SILA SAN PEDRO 374 West 12<sup>th</sup> Street Hialeah, FL 33010

and

CESAR SAN PEDRO 374 West 12<sup>th</sup> Street Hialeah, FL 33010

and

GUILLERMO SAN PEDRO 374 West 12<sup>th</sup> Street Hialeah, FL 33010

and

JAVIER SAN PEDRO 374 West 12<sup>th</sup> Street Hialeah, FL 33010

and

SILA SAN PEDRO. 374 West 12<sup>th</sup> Street Hialeah, FL 33010

and

THURNELL SHIELDS 5618 Foxtail Wesley Chapel, FL 33543

and

EMMANUEL SIMMONS 319 Exmoor Drive Jacksonville, NC 28540

and

THE ESTATE OF JAMES SURCH By and through PATTY BARNETT 4109 Federman Lane San Diego, CA 92130

and

PATTY BARNETT 4109 Federman Lane San Diego, CA 92130

and

WILL SURCH 21 Archilla Rancho Santa Margarita, CA 92688

and

BRADLEY ULICK P.O. Box 338 Atkinson, IL 61235

and

JEANETTE DOUGHERTY 701 Fischer Road, Lot 13 Creve Couer, IL 61610

and

MARILYN PETERSON 113 Buckeye Morton, IL 61550

and

THE ESTATE OF ERIC WALKER By and through TENA WALKER-JONES P.O. Box 4107 Gary, IN 46404

and

TENA WALKER-JONES P.O. Box 4107 Gary, IN 46404

and

RONALD E. WALKER 413 Pine Valley Road Jacksonville, NC 28546

and

RONNIE WALKER 117 Eastfield Road Newark, DE 19713

and

GALEN WEBER 1551 Halltown Road Jacksonville, NC 28546

and

THE ESTATE OF OBRIAN WEEKES By and through IANTHE WEEKES 345 Fenimore Street Brooklyn, NY 11225

and

ANSON EDMOND 345 Fenimore Street Brooklyn, NY 11225

and

ARNOLD EDMOND 345 Fenimore Street Brooklyn, NY 11225

and

HAZEL EDMOND 4143 NW 19<sup>th</sup> Street Lauderhill, FL 33313

and

WENDY EDMOND 345 Fenimore Street Brooklyn, NY 11225

and

FAITH WEEKES 287 Clarkson Avenue, Apt. 4L Brooklyn, NY 11226

and

IANTHE WEEKES 345 Fenimore Street Brooklyn, NY 11225

and

KEITH WEEKES 345 Fenimore Street Brooklyn, NY 11225

and

META WEEKES 623 Park Place, Apt. 3 Brooklyn, NY 11231

and

THE ESTATE OF DENNIS L. WEST By and through KATHY WEST 171 Johnny Parker Road, Lot 5 Jacksonville, NC 28540

and

KATHY WEST 171 Johnny Parker Road, Lot 5 Jacksonville, NC 28540

and

THE ESTATE OF JOHN WEYL By and through SHARON ROWAN 107 Glencroft Road Hubert, NC 28539

and

KELLY BACHLOR 629 West Main Street Newark, OH 43055

and

ROBIN BROCK 102 Plumtree Lane Castle Hayne, NC 28429

and

MORGAN W. ROWAN 107 Glencroft Road Hubert, NC 28539

and

SHARON ROWAN 107 Glencroft Road Hubert, NC 28539

and

NELSON WEYL 11456 132<sup>nd</sup> Avenue, North Largo, FL 33778

and

THE ESTATE OF JAMES SILVIA By and through LYNNE MICHOL SPENCER 111 Edmund Road Jewett City, CT 06351 and

LYNNE MICHOL SPENCER 111 Edmund Road Jewett City, CT 06351

**Plaintiffs** 

٧.

THE ISLAMIC REPUBLIC OF IRAN Ministry of Foreign Affairs Khomeini Avenue United Nations Street Tehran, Iran

and

THE IRANIAN MINISTRY
OF INFORMATION AND SECURITY
Pasdaran Avenue
Golestan Tekom
Tehran, Iran

Defendants.

# AMENDED COMPLAINT

- Plaintiffs amend their Complaint as a matter of course pursuant to Fed. R. of Civ. P.
   15(a)(1). No responsive pleading has been served.
- 2. Plaintiffs bring this action as a related action pursuant to the provisions of the newly enacted Defense Authorization Act for Fiscal Year 2008, Section 1083(c), Pub. L. No. 110-181, §1083, 122 Stat. 3, 338-344 (2008) and 28 U.S.C. § 1602, et seq.
- 3. This action is brought by the Plaintiffs, by and through their counsel, in the individual capacity of each plaintiff and, as appropriate, in the capacity of each as personal representative of the estate more particularly described in the caption of this action for their own benefit, for the benefit of each particular estate, and for the benefit and on behalf of all those legally entitled to

assert a claim under the Foreign Sovereign Immunities Act 28 U.S.C. § 1605A(c), and state common law and statutory law. This Court exercises subject matter jurisdiction in accordance with the provisions of 28 U.S.C. §§ 1330(a), 1331, 1332(a)(2), and 1605A.

- 4. The Court exercises *in personam* jurisdiction over the parties designated as Defendants in accordance with the provisions of 28 U.S.C. § 1602, *et seq*.
- 5. Venue in this Court is proper in accordance with the provisions of 28 U.S.C. § 1391 (f)(4), which provides, in pertinent part, that a civil action against a foreign State may be brought in the United States District Court for the District of Columbia.
- 6. The Plaintiffs in this action consist entirely of American Nationals who were members of the United States Marine Corps, United States Navy and United States Army, the estates of such persons, and their heirs at law and legatees of such persons, who suffered injuries or died as a result of injuries inflicted in the terrorist attack upon the headquarters building of the 24<sup>th</sup> Marine Amphibious Unit in Beirut, Lebanon on October 23, 1983 ("Marine Barracks Bombing"). Members of the United States Navy and United States Army were present at the site of the occurrence in support of the 24<sup>th</sup> Amphibious Unit, either on a regular assigned basis or temporarily, on the date of the occurrence below set forth.

# THE PARTIES

# A. The Plaintiffs

# **The Brown Family**

7. Plaintiff The Estate of Anthony Brown is represented in this action by and through Vara Brown. Anthony Brown was, at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his death, a citizen and resident of the State

of Michigan. The death of Anthony Brown was caused by a willful and deliberate act of extra judicial killing by the Defendants.

- 8. Plaintiff Vara Brown at all times relevant hereto is and was the mother of Plaintiff Anthony Brown. Plaintiff Vara Brown is a citizen of the United States of America who resides in the State of Michigan. The murder of her son Anthony has caused Vara severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Vara Brown can sue and be sued in this Court.
- 9. Plaintiff John Brown at all times relevant hereto is and was the legal father of Plaintiff Anthony Brown. Plaintiff John Brown is a citizen of the United States of America who resides in the State of Michigan. The murder of his son Anthony has caused John severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff John Brown can sue and be sued in this Court.
- 10. Plaintiff Sulba Brown at all times relevant hereto is and was the brother of Plaintiff Anthony Brown. Plaintiff Sulba Brown is a citizen of the United States of America who resides in the State of Michigan. The murder of his brother Anthony has caused Sulba severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Sulba Brown can sue and be sued in this Court.
- 11. Plaintiff Rowel Brown at all times relevant hereto is and was the brother of Plaintiff Anthony Brown. Plaintiff Rowel Brown is a citizen of the United States of America who resides in the State of Michigan. The murder of his brother Anthony has caused Rowel severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Rowel Brown can suc and be sued in this Court.

12. Plaintiff Marvine McBride at all times relevant hereto is and was the sister of Plaintiff Anthony Brown. Plaintiff Marvine McBride is a citizen of the United States of America who resides in the State of Michigan. The murder of her brother Anthony has caused Marvine severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Marvine McBride can suc and be sucd in this Court.

13. Plaintiff LaJuana Smith at all times relevant hereto is and was the sister of Plaintiff Anthony Brown. Plaintiff LaJuana Smith is a citizen of the United States of America who resides in the State of Michigan. The murder of her brother Anthony has caused LaJuana severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff LaJuana Smith can sue and be sued in this Court.

#### The Barile Family

14. Plaintiff Joseph A. Barile was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of North Carolina. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Joseph.

15. Plaintiff Angela E. Barile at all times relevant hereto is and was the mother of Plaintiff Joseph A. Barile. Plaintiff Angela E. Barile is a citizen of the United States of America who resides in the State of Florida. The injury of her son Joseph has caused Angela severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Angela E. Barile can sue and be sued in this Court.

16. Plaintiff Michael Barile at all times relevant hereto is and was the brother of Plaintiff Joseph A. Barile. Plaintiff Michael Barile is a citizen of the United States of America who resides in the State of New Jersey. The injury of his brother Joseph has caused Michael severe

mental anguish, pain, suffering and extreme emotional distress. Plaintiff Michael Barile can sue and be sued in this Court.

17. Plaintiff Andrea Ciarla at all times relevant hereto is and was the sister of Plaintiff Joseph A. Barile. Plaintiff Andrea Ciarla is a citizen of the United States of America who resides in the State of Florida. The injury of her brother Joseph has caused Andrea severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Andrea Ciarla can sue and be sued in this Court.

18. Plaintiff Ann Marie Moore at all times relevant hereto is and was the sister of Plaintiff Joseph A. Barile. Plaintiff Ann Marie Moore is a citizen of the United States of America who resides in the State of Florida. The injury of her brother Joseph has caused Ann Marie severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Ann Marie Moore can sue and be sued in this Court.

19. Plaintiff Angela Yoak at all times relevant hereto is and was the sister of Plaintiff Joseph A. Barile. Plaintiff Angela Yoak is a citizen of the United States of America who resides in the State of California. The injury of her brother Joseph has caused Angela severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Angela Yoak can sue and be sued in this Court.

# The Becker Family

20. Plaintiff John Becker was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of Indiana. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to John.

# The Burns Family

- 21. Plaintiff Rodney E. Burns was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of Missouri. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Rodney.
- 22. Plaintiff David Burns at all times relevant hereto is and was the brother of Plaintiff Rodney E. Burns. Plaintiff David Burns is a citizen of the United States of America who resides in the State of Missouri. The injury of his brother Rodney has caused David severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff David Burns can sue and be sued in this Court.
- 23. Plaintiff Eugene Burns at all times relevant hereto is and was the father of Plaintiff Rodney E. Burns. Plaintiff Eugene Burns is a citizen of the United States of America who resides in the State of Missouri. The injury of his son Rodney has caused Eugene severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Eugene Burns can sue and be sued in this Court.
- 24. Plaintiff Jeannie Scaggs at all times relevant hereto is and was the mother of Plaintiff Rodney E. Burns. Plaintiff Jeannie Scaggs is a citizen of the United States of America who resides in the State of Missouri. The injury of her son Rodney has caused Jeannie severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Jeannie Scaggs can sue and be sued in this Court.

# **The Cuddeback Family**

25. Plaintiff Daniel Cuddeback, Jr. was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident

of the State of New York. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Daniel.

26. Plaintiff Barbara Cuddeback at all times relevant hereto is the mother of Plaintiff Daniel Cuddeback, Jr. Plaintiff Barbara Cuddeback is a citizen of the United States of America who resides in the State of New York. The injury of her son Daniel has caused Barbara severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Barbara Cuddeback can sue and be sued in this Court.

27. Plaintiff Daniel Cuddeback, Sr. at all times relevant hereto is the father of Plaintiff Daniel Cuddeback, Jr. Plaintiff Daniel Cuddeback, Sr. is a citizen of the United States of America who resides in the State of New York. The injury of his son Daniel, Jr. has caused Daniel, Sr. severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Daniel Cuddeback, Sr. can sue and be sued in this Court.

28. Plaintiff John R. Cuddeback at all times relevant hereto is the son of Plaintiff Daniel Cuddeback, Jr. Plaintiff John R. Cuddeback is a citizen of the United States of America who resides in the State of New York. The injury of his father Daniel has caused John severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff John R. Cuddeback can sue and be sued in this Court.

# The Dean Family

29. Plaintiff Robert Dean was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of Arkansas. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Robert.

# The Episcopo Family

30. Plaintiff Michael Episcopo was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of New York. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Michael.

# The Gaddo Family

- 31. Plaintiff Randy Gaddo was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of Georgia. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Randy.
- 32. Plaintiff Louise Gaddo Blattler at all times relevant hereto is the sister of injured marine Randy Gaddo. Plaintiff Louise Gaddo Blattler is a citizen of the United States of America who resides in the State of Indiana. The injury of her brother Randy has caused Louise severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Louise Gaddo Blattler can sue and be sued in this Court.
- 33. Plaintiff Peter Gaddo at all times relevant hereto is the brother of injured marine Randy Gaddo. Plaintiff Peter Gaddo is a citizen of the United States of America who resides in the State of North Carolina. The injury of his brother Randy has caused Peter severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Peter Gaddo can sue and be sued in this Court.
- 34. Plaintiff Timothy Gaddo at all times relevant hereto is the brother of injured marine Randy Gaddo. Plaintiff Timothy Gaddo is a citizen of the United States of America who resides in the State of Minnesota. The injury of his brother Randy has caused Timothy severe mental

anguish, pain, suffering and extreme emotional distress. Plaintiff Timothy Gaddo can suc and be sued in this Court.

# The Gaines Family

- 35. Plaintiff The Estate of William R. Gaines, Jr., is represented in this action by and through Michael A. Gaines. William R. Gaines, Jr. was, at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his death, a citizen and resident of the State of Kentucky. The death of William R. Gaines, Jr. was caused by a willful and deliberate act of extra judicial killing by the Defendants.
- 36. Plaintiff Evelyn Sue Spears Elliott at all times relevant hereto is and was the sister of Plaintiff William R. Gaines, Jr. Plaintiff Evelyn Sue Spears Elliott is a citizen of the United States of America who resides in the State of Kentucky. The murder of her brother William has caused Evelyn severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Evelyn Sue Spears Elliott can sue and be sued in this Court.
- 37. Plaintiff Michael A. Gaines at all times relevant hereto is and was the brother of Plaintiff William R. Gaines, Jr. Plaintiff Michael A. Gaines is a citizen of the United States of America who resides in the State of Florida. The murder of his brother William has caused Michael severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Michael A. Gaines can sue and be sued in this Court.
- 38. Plaintiff William R. Gaines, Sr. at all times relevant hereto is and was the father of Plaintiff William R. Gaines, Jr. Plaintiff William R. Gaines, Sr. is a citizen of the United States of America who resides in the State of Florida. The murder of his son William, Jr. has caused William, Sr. severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff William R. Gaines, Sr. can sue and be sued in this Court.

39. Plaintiff Carolyn Spears at all times relevant hereto is and was the mother of Plaintiff William R. Gaines, Jr. Plaintiff Carolyn Spears is a citizen of the United States of America who resides in the State of Kentucky. The murder of her son William has caused Carolyn severe

mental anguish, pain, suffering and extreme emotional distress. Plaintiff Carolyn Spears can sue

and be sued in this Court.

40. Plaintiff James S. Spears at all times relevant hereto is and was the brother of Plaintiff

William R. Gaines, Jr. Plaintiff James S. Spears is a citizen of the United States of America who

resides in the State of Kentucky. The murder of his brother William has caused James severe

mental anguish, pain, suffering and extreme emotional distress. Plaintiff James S. Spears can sue

and be sued in this Court.

41. Plaintiff Mark Spears at all times relevant hereto is and was the brother of Plaintiff

William R. Gaines, Jr. Plaintiff Mark Spears is a citizen of the United States of America who

resides in the State of Kentucky. The murder of his brother William has caused Mark severe

mental anguish, pain, suffering and extreme emotional distress. Plaintiff Mark Spears can sue

and be sued in this Court.

42. Plaintiff Carol Weaver at all times relevant hereto is and was the wife of Plaintiff

William R. Gaines, Jr. Plaintiff Carol Weaver is a citizen of the United States of America who

resides in the State of Tennessee. The murder of her husband William has caused Carol severe

mental anguish, pain, suffering and extreme emotional distress. Plaintiff Carol Weaver can sue

and be sued in this Court.

The Hamilton Family

43. Plaintiff The Estate of Virgel D. Hamilton is represented in this action by and through

Gloria Hamilton. Virgel D. Hamilton was, at the time of the Marine Barracks Bombing and

throughout his lifetime, an American citizen and, at the time of his death, a citizen and resident of the State of Ohio. The death of Virgel D. Hamilton was caused by a willful and deliberate act of extra judicial killing by the Defendants.

44. Plaintiff Gloria Hamilton at all times relevant hereto is and was the wife of Plaintiff Virgel D. Hamilton. Plaintiff Gloria Hamilton is a citizen of the United States of America who resides in the State of Ohio. The murder of her husband Virgel has caused Gloria severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Gloria Hamilton can sue and be sued in this Court.

# The Hastings Family (1)

45. Plaintiff Bruce S. Hastings at all times relevant hereto is the brother of deceased marine Michael Hastings whose estate is a plaintiff in the action *Estate of Stephen B. Bland, et al v. Islamic Republic of Iran, et al* and this action. Bruce S. Hastings is a citizen of the United States of America who resides in the State of Delaware. The murder of his brother Michael has caused Bruce severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Bruce S. Hastings can sue and be sued in this Court.

#### The Hodges Family

- 46. Plaintiff Maynard Hodges was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of Virginia. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Maynard.
- 47. Plaintiff Loretta Brown at all times relevant hereto is the sister of injured marine Maynard Hodges. Plaintiff Loretta Brown is a citizen of the United States of America who resides in the State of Virginia. The injury of her brother Maynard has caused Loretta severe

mental anguish, pain, suffering and extreme emotional distress. Plaintiff Loretta Brown can sue and be sued in this Court.

- 48. Plaintiff Kathy Hodges at all times relevant hereto is the wife of injured marine Maynard Hodges. Plaintiff Kathy Hodges is a citizen of the United States of America who resides in the State of Virginia. The injury of her husband Maynard has caused Kathy severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Kathy Hodges can sue and be sued in this Court.
- 49. Plaintiff Mary Jean Hodges at all times relevant hereto is the mother of injured marine Maynard Hodges. Plaintiff Maynard Hodges is a citizen of the United States of America who resides in the State of Virginia. The injury of her son Maynard has caused Mary Jean severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Mary Jean Hodges can sue and be sued in this Court.
- 50. Plaintiff Cindy Holmes at all times relevant hereto is the sister of injured marine Maynard Hodges. Plaintiff Cindy Holmes is a citizen of the United States of America who resides in the State of North Carolina. The injury of her brother Maynard has caused Cindy severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Cindy Holmes can sue and be sued in this Court.
- 51. Plaintiff Shana Saul at all times relevant hereto is the daughter of injured marine Maynard Hodges. Plaintiff Shana Saul is a citizen of the United States of America who resides in the State of Virginia. The injury of her father Maynard has caused Shana severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Shana Saul can sue and be sued in this Court.

# The Joy Family

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52. Plaintiff Daniel Joy was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of North Carolina. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Daniel.

# The Kirkpatrick Family

53. Plaintiff Sean Kirkpatrick at all times relevant hereto is the son of injured marine Brian Carl Kirkpatrick who is a plaintiff in another action. Sean Kirkpatrick is a citizen of the United States of America who resides in the State of Washington. The injury of his father Brian has caused Sean severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Sean Kirkpatrick can sue and be sued in this Court.

# The Kremer Family

- 54. Plaintiff Daniel Kremer was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of New York. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Daniel.
- 55. Plaintiff The Estate of Christina Kremer is represented in the action by and through Joseph T. Kremer, Administrator of said estate. Christina Kremer at all times relevant hereto was the mother of injured marine Daniel Kremer. The injury of her son Daniel caused Christine severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff The Estate of Christina Kremer can sue and be sued in this Court.
- 56. Plaintiff Joseph T. Kremer at all times relevant hereto is the brother of injured marine Daniel Kremer. Plaintiff Joseph T. Kremer is a citizen of the United States of America who resides in the State of New York. The injury of his brother Daniel has caused Joseph severe

mental anguish, pain, suffering and extreme emotional distress. Plaintiff Joseph Kremer can sue and be sued in this Court.

57. Plaintiff The Estate of Thomas Kremer is represented in the action by and through Joseph T. Kremer, Administrator of said estate. Thomas Kremer at all times relevant hereto was the father of injured marine Daniel Kremer. The injury of his son Daniel caused Thomas severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff The Estate of Thomas Kremer can sue and be sued in this Court.

58. Plaintiff Jacqueline Stahrr at all times relevant hereto is the sister of injured marine Daniel Kremer. Plaintiff Jacqueline Stahrr is a citizen of the United States of America who resides in the State of New York. The injury of her brother Daniel has caused Jacqueline severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Jacqueline Stahrr can sue and be sued in this Court.

# The Lewis Family

59. Plaintiff The Estate of David A. Lewis is represented in this action by and through Betty Lewis. David A. Lewis was, at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his death, a citizen and resident of the State of Ohio. The death of David A. Lewis was caused by a willful and deliberate act of extra judicial killing by the Defendants.

60. Plaintiff Betty Lewis at all times relevant hereto is and was the mother of Plaintiff David A. Lewis. Plaintiff Betty Lewis is a citizen of the United States of America who resides in the State of Ohio. The murder of her son David has caused Betty severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Betty Lewis can sue and be sued in this Court.

61. Plaintiff Jerry L. Lewis at all times relevant hereto is and was the brother of Plaintiff David A. Lewis. Plaintiff Jerry L. Lewis is a citizen of the United States of America who resides in the State of Ohio. The murder of his brother David has caused Jerry severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Jerry L. Lewis can sue and be sued in this Court.

62. Plaintiff Scott M. Lewis at all times relevant hereto is and was the brother of Plaintiff David Λ. Lewis. Plaintiff Scott M. Lewis is a citizen of the United States of America who resides in the State of Ohio. The murder of his brother David has caused Scott severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Scott M. Lewis can sue and be sued in this Court.

# The Martinez Family

63. Plaintiff Paul Martinez, Sr. was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of Michigan. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to Paul.

64. Plaintiff Teresa Gunther at all times relevant hereto is the sister of injured marine Paul Martinez, Sr. Plaintiff Teresa Gunther is a citizen of the United States of America who resides in the State of Michigan. The injury of her brother Paul has caused Teresa severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Teresa Gunther can sue and be sued in this Court.

65. Plaintiff Alphonso Martinez at all times relevant hereto is the brother of injured marine Paul Martinez, Sr. Plaintiff Alphonso Martinez is a citizen of the United States of America who resides in the State of Michigan. The injury of his brother Paul has caused

Alphonso severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Alphonso Martinez can sue and be sued in this Court.

- 66. Plaintiff Daniel L. Martinez at all times relevant hereto is the brother of injured marine Paul Martinez, Sr. Plaintiff Daniel L. Martinez is a citizen of the United States of America who resides in the State of Michigan. The injury of his brother Paul has caused Daniel severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Daniel L. Martinez can sue and be sued in this Court.
- 67. Plaintiff Michael Martinez at all times relevant hereto is the brother of injured marine Paul Martinez, Sr. Plaintiff Michael Martinez is a citizen of the United States of America who resides in the State of Michigan. The injury of his brother Paul has caused Michael severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Michael Martinez can sue and be sued in this Court.
- 68. Plaintiff Paul Martinez, Jr. at all times relevant hereto is the son of injured marine Paul Martinez, Sr. Plaintiff Paul Martinez, Jr. is a citizen of the United States of America who resides in the State of Michigan. The injury of his father Paul, Sr. has caused Paul, Jr. severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Paul Martinez, Jr. can sue and be sued in this Court.
- 69. Plaintiff Tomasita L. Martinez at all times relevant hereto is the mother of injured marine Paul Martinez, Sr. Plaintiff Tomasita L. Martinez is a citizen of the United States of America who resides in the State of Michigan. The injury of her son Paul has caused Tomasita severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Tomasita L. Martinez can sue and be sued in this Court.

70. Plaintiff Esther Martinez Parks at all times relevant hereto is the sister of injured marine Paul Martinez, Sr. Plaintiff Esther Martinez Parks is a citizen of the United States of America who resides in the State of Michigan. The injury of her brother Paul has caused Esther severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Esther Martinez Parks can sue and be sued in this Court.

71. Plaintiff Susanne Yeoman at all times relevant hereto is the sister of injured marine Paul Martinez, Sr. Plaintiff Susanne Yeoman is a citizen of the United States of America who resides in the State of Michigan. The injury of her brother Paul has caused Susanne severe mental anguish, pain, suffering and extreme emotional distress. Plaintiff Susanne Yeoman can sue and be sued in this Court.

#### The Opatovsky Family

72. Plaintiff John Opatovsky was at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his injury, a citizen and resident of the State of New York. The willful and wrongful and intentional acts of the Defendants caused extreme mental anguish, physical injury and pain and suffering to John.

# The Owen Family

73. Plaintiff The Estate of Jeffrey B. Owen is represented in this action by and through Steven Owen, Administrator of said Estate. Jeffrey B. Owen was, at the time of the Marine Barracks Bombing and throughout his lifetime, an American citizen and, at the time of his death, a citizen and resident of the State of Virginia. The death of Jeffrey B. Owen was caused by a willful and deliberate act of extra judicial killing by the Defendants.

74. Plaintiff Jean G. Owen at all times relevant hereto is and was the mother of Plaintiff Jeffrey B. Owen. Plaintiff Jean G. Owen is a citizen of the United States of America who resides